

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

|                                 |   |                     |
|---------------------------------|---|---------------------|
| RICHARD PIOTROWSKI,             | ) |                     |
|                                 | ) |                     |
| Plaintiff,                      | ) | C.A. NO. 06-631-SLR |
|                                 | ) |                     |
| v.                              | ) | TRIAL BY JURY OF    |
|                                 | ) | TWELVE DEMANDED     |
| MAO M. IAN and SUI MAI,         | ) |                     |
| INSURANCE CORP. OF HANNOVER,    | ) |                     |
| and ALLSTATE INSURANCE COMPANY, | ) |                     |
|                                 | ) |                     |
| Defendants.                     | ) |                     |

**DEFENDANT ALLSTATE'S ANSWER TO AMENDED COMPLAINT**

1. Admitted upon information and belief.
2. No response required.
3. No response required.
4. No response required.
5. Admitted.
6. Admitted upon information and belief.
7. No response required.
8. The policy speaks for itself.
9. Answering defendant is without sufficient information to answer these allegations.
10. Answering defendant is without sufficient information to answer these allegations.
11. Answering defendant is without sufficient information to answer these allegations.
12. Answering defendant is without sufficient information to answer these allegations.
13. Answering defendant is without sufficient information to answer these allegations.
14. Answering defendant is without sufficient information to answer these allegations.

15. Answering defendant is without sufficient information to answer these allegations.

**COUNT I**

16. Answering defendant incorporates by reference paragraphs 1 through 15 of this Answer.

17. No response required.

18. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

**COUNT II**

19. Answering defendant incorporates by reference paragraphs 1 through 18 of this Answer.

20. No response required.

21. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

**COUNT III**

22. Answering defendant incorporates by reference paragraphs 1 through 21 of this Answer.

23. No response required.

24. No response required.

25. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

**COUNT IV**

26. Answering defendant incorporates by reference paragraphs 1 through 25 of this Answer.

27. No response required.

28. Denied.

29. Denied.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

**AFFIRMATIVE DEFENSES**

30. The complaint fails to state a claim against defendant Allstate Insurance Company upon which relief can be granted.

MICHAEL A. PEDICONE, P.A.

By: /s/ Michael A. Pedicone

Michael A. Pedicone, Esquire (No. 2424)

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(302) 652-7850

Attorney for Third Party Defendant

Allstate Insurance Company

Dated: September 13, 2007

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|                                 | ) |                     |
| Defendants.                     | ) |                     |

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused copies of the foregoing Defendant Allstate's Answer to Amended Complaint to be served via e-file and US mail on September 13, 2007, upon:

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Third Party Plaintiffs

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Dated: September 13, 2007